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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISIONJENNIFER BEASLEY; DR. KIFFANY
PRIDE; LAURA SHIRLEY; and
NICOLE TOWNSEND,

PLAINTIFFS,

VS. NO. 4:18-cv-508-DPM

DR. CHARLES MCNULTY, in his official
capacity as Superintendent of Schools
of the Pulaski County Special School
District; PULASKI COUNTY SPECIAL SCHOOL
DISTRICT BOARD OF DIRECTORS; and
PULASKI COUNTY SPECIAL SCHOOL DISTRICT,
a public body corporate,

DEFENDANTS.

DEPOSITION

OF

JENNIFER BEASLEY

TUESDAY, OCTOBER 8, 2019-----
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JENNIFER BEASLEY
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APPEARANCES:

ON BEHALF OF PLAINTIFFS:

JOHN WALKER, ESQUIRE
JOY SPRINGER, Administrative Assistant
John Walker Law Firm
1723 South Broadway Street
Little Rock, Arkansas 72206

ON BEHALF OF DEFENDANTS:

W. CODY KEEES, ESQUIRE
Bequette and Billingsley
425 West Capitol Avenue
Suite 3200
Little Rock, Arkansas 72201ALSO PRESENT:
MS. NICOLE TOWNSEND
MS. SHAWN BURGESS-----
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1 The deposition of Jennifer Beasley was
2 taken before me, Debbye L. Petre, Certified Court
3 Reporter and notary public within and for the County
4 of Pulaski, State of Arkansas, duly commissioned and
5 acting, on Tuesday, October 8, 2019, beginning at the
6 hour of 10:15 a.m., at the offices of John Walker Law
7 Firm, 1723 South Broadway Street, Little Rock, Pulaski
8 County, Arkansas.9 Said deposition being taken in
10 accordance with the Rules of Federal Procedure and
11 pursuant to the provisions of the Arkansas Rules of
12 Civil Procedure at instance of counsel for the
13 Defendants in the above-styled case in the United
14 States District Court, Eastern District of Arkansas,
15 Western Division.16 -----
17 THEREUPON, the following proceedings were had,
18 to-wit:
19 -----
20 -----
21 -----

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1 PROCEEDINGS
 2 WHEREUPON,
 3 JENNIFER BEASLEY,
 4 having been called for examination, and having been
 5 first duly sworn, was examined and testified as
 6 follows:

DIRECT EXAMINATION

BY MR. KEEES:

Q Good morning, Ms. Beasley. My name is Cody Kees, and I represent the Pulaski County Special School District in a lawsuit that you and three other ladies have filed. And I'm going to take your deposition today. Okay?

A Yes, sir.

Q Have you ever given a deposition before?

A No.

Q So, you are under oath, and this is an opportunity for me to ask you questions about your lawsuit and your knowledge and your background in preparation for the trial of the matter. Okay?

A Yes.

Q And everything is being typed down by Ms. Petre here. So, make sure and give me audible answers, "yes", "no", "I don't understand," et cetera. Okay?

A Yes.

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1 you?
 2 A Yes. My daughter is in college, but, yes.
 3 Q Destiny?
 4 A Yes.
 5 Q Where is she in college?
 6 A Grambling State University.
 7 Q Okay. That's great. Where do Keith, Denzel, and Derick go to school?

9 A Keith and Denzel go to Parkview High School, 10 Derick goes to Horace Mann Middle School.

11 Q So, you are zoned in Little Rock?

12 A Yes.

13 Q What does your husband do, Ms. Beasley?

14 A He is disabled. So, he had his left leg amputated, so he is disabled.

16 Q I'm sorry to hear that. Was he military?

17 A No.

18 Q Work accident?

19 A Motorcycle accident, yes.

20 Q So, his only income is from his disability income?

22 A Disability, and we have rental property, yes.

23 Q Property, more than one?

24 A Yes. We have properties, yes, in Little Rock, one, two -- we have sold a couple since. I think it's

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1 Q And on that note, if I ask a question and you
 2 don't understand, just simply tell me, "I don't
 3 understand," or, "Can you rephrase that," because the
 4 record, I want to make sure it reflects accurately
 5 what you told me.

6 A Yes.

7 Q And you know Ms. Burgess?

8 A Yes.

9 Q She is here for the district. Let's start, what
 10 is your date of birth?

11 A June 7th, 1973.

12 Q And to make things easier, I'm going to run
 13 through some discovery responses and you can just tell
 14 me if they are right or wrong.

15 A Okay.

16 Q You're still married to Derick?

17 A Yes, sir.

18 Q And you still live at 16303 Ironton Road?

19 A Yes.

20 Q I-R-O-N-T-O-N?

21 A Yes.

22 Q And I count that you have a daughter and three sons?

24 A Yes.

25 Q And do they still all live in the residence with

Page 8

1 three.

2 Q Are your parents living?

3 A My dad is living.

4 Q What is his name?

5 A Oliver Walter Thomas, Senior.

6 Q Thomas is your maiden name?

7 A Yes.

8 Q T-H-O-M-A-S?

9 A Yes.

10 Q Do you have any siblings that live in the central Arkansas area?

12 A Yes. I have a brother, Oliver Thomas, Junior.

13 He lives in Conway.

14 Q No other siblings?

15 A Not in this area, no.

16 Q And your mother is deceased?

17 A Yes.

18 Q Any other close relatives?

19 A In this area? I have a stepson and a stepdaughter. Stepson lives in Little Rock.

21 Q So, Derick was previously married?

22 A Yes, twice.

23 Q Okay. What are your stepchildren's names?

24 A Derick Beasley, II, and Cameria Beasley -- what is her last name. Cameria Beasley. What is her last

Page 9	Page 10
<p>1 name? Hold on. Blake.</p> <p>2 Q Blake?</p> <p>3 A Yes.</p> <p>4 Q Okay.</p> <p>5 A She lives in Conway, Arkansas.</p> <p>6 Q Where were you born?</p> <p>7 A Magnolia, Arkansas.</p> <p>8 Q You told me that earlier. And where did you go to college?</p> <p>10 A I went to Grambling State University, Louisiana Tech University, and I finished my program at Northeast Louisiana. Now it's University of Louisiana, Monroe.</p> <p>14 Q That's where you finished your Bachelors degree?</p> <p>15 A Yes.</p> <p>16 Q And did you go from high school directly to college?</p> <p>18 A Yes.</p> <p>19 Q And then, did you complete college in how many years?</p> <p>21 A Five.</p> <p>22 Q Five?</p> <p>23 A Uh-huh. (Indicated yes.)</p> <p>24 Q And then, did you -- do you have any post-college education?</p>	<p>1 A Yes.</p> <p>2 Q Masters?</p> <p>3 A I have two Masters and I'm a doctoral candidate.</p> <p>4 Q You submitted a resume, did you not?</p> <p>5 A Yes.</p> <p>6 Q Let me just pull it up, it will make things faster. Where are you a doctoral candidate?</p> <p>8 A Yes.</p> <p>9 Q Where?</p> <p>10 A Grand Canyon University. Can we go back? You asked were we zoned in Little Rock. We are zoned in Pulaski County. My kids go to school in Little Rock.</p> <p>13 Q Okay.</p> <p>14 A Because I worked there, and then my property is there. So, we are not zoned in Little Rock.</p> <p>16 Q Oh, okay. So, your property is in Pulaski County?</p> <p>18 A Yes.</p> <p>19 Q You worked there prior to --</p> <p>20 A Prior to working for PCSSD.</p> <p>21 Q Okay. I have seen your resume this morning, that would probably make it easier. I think I'm missing page one. Do you have that with you, by chance?</p> <p>25 A I do. Exhibit Number Three. It's -- my</p>
<p style="text-align: center;">Page 11</p> <p>1 education, it's kind of behind that. So, it's number three.</p> <p>3 Q Oh, then I have it, then?</p> <p>4 A Yes. And it's page two, three, four, five.</p> <p>5 Q So, you have your Bachelors, you have a Masters in instructional technology?</p> <p>7 A Yes.</p> <p>8 Q You have a Masters in administration?</p> <p>9 A Yes.</p> <p>10 Q From Grand Canyon University?</p> <p>11 A Yes.</p> <p>12 Q That was online?</p> <p>13 A Yes.</p> <p>14 Q What does "administration" mean?</p> <p>15 A Education administration, K-12.</p> <p>16 Q So, two Masters degrees; correct?</p> <p>17 A Yes.</p> <p>18 Q And you have a certificate for curriculum program administrator from Arkansas State?</p> <p>20 A Yes.</p> <p>21 Q Was that a combination of online and going to the university?</p> <p>23 A It was online, strictly online. It was a certification program.</p> <p>25 Q When did you do this, at home, at night, on</p>	<p style="text-align: center;">Page 12</p> <p>1 weekends?</p> <p>2 A Yes.</p> <p>3 Q So, your degree was in radiologic technology?</p> <p>4 A Yes. I was a registered radiologic technology.</p> <p>5 Q So, did you want to work in a medical setting?</p> <p>6 A I started out biology pre-med. So, I'm nontraditional. I was registered 1996 through 1999.</p> <p>8 Q When did you locate to Little Rock?</p> <p>9 A 2001, April 2001.</p> <p>10 Q Was that soon after you were married?</p> <p>11 A Two years after I got married. I got married in 1998, December 31st, 1998.</p> <p>13 Q Did you live in south Arkansas then?</p> <p>14 A Lived in Camden for two years. And then, April 2001, we moved to Little Rock, Arkansas.</p> <p>16 Q For your work?</p> <p>17 A We wanted to move. So, my husband had just became -- well, he was disabled, he just stopped working, because he worked five years.</p> <p>20 Q Did he work at the paper mill?</p> <p>21 A No. He worked at Camden Housing Authority for 18 years.</p> <p>23 Q Okay.</p> <p>24 A And he finally stopped working. So, we moved up here for me.</p>

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1 Q Okay. And then, so, employment -- oh, I
 2 remember reading, you worked for the prosecuting
 3 attorney?
 4 A Yes.
 5 Q That's interesting.
 6 A It was.
 7 Q And then, your first teaching job, am I correct,
 8 public school district was LRSD?
 9 A It was -- I think on our thing, it was over 20
 10 years ago, I didn't put it down, but it was --
 11 Q Kids Express?
 12 A It was before that. Red River Parish in
 13 Coushatta, Louisiana. That was in 1996. So, it was
 14 over 20 years ago.
 15 Q When you were in school?
 16 A No. Right after school.
 17 Q Okay. So --
 18 A I wasn't certified then.
 19 Q I got you. So, your first certified position?
 20 A Was in Little Rock.
 21 Q All right. And you were at MLK?
 22 A Yes.
 23 Q You were interim assistant principal there?
 24 A Yes, my last year.
 25 Q So, you were there from 2006 to 2012?

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1 A Yes.
 2 Q And while you were there, did you get your admin
 3 certificate?
 4 A Yes. I didn't get my certificate. I got my
 5 degree while I was a classroom teacher.
 6 Q The Masters degree?
 7 A Yes.
 8 Q Which allowed you to be an admin?
 9 A Yes.
 10 Q Was that the one, the Masters of Education you
 11 got at AIU online?
 12 A No, that's instructional technology. It was the
 13 one at Grand Canyon.
 14 Q Okay. Masters of Education?
 15 A Yes.
 16 Q Got it. All right. So, six years at LRSD, the
 17 entire time was at MLK Elementary?
 18 A Yes.
 19 Q And you left there to go work at PCSSD?
 20 A Yes.
 21 Q You also spent some time at Arkansas Baptist
 22 College?
 23 A Yes. I was an adjunct professor.
 24 Q While at --
 25 A While at PCSSD. I did evening classes.

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1 Q What did you teach?
 2 A I taught intro to computers.
 3 Q Great. So, you did a lot of things in the
 4 evening, school or work?
 5 A Yes.
 6 Q I know you work in the home with your kids. But
 7 does your husband have responsibilities in the home?
 8 A Yes.
 9 Q Like helping with the kids?
 10 A Yes, pick up. He picks up when they were in
 11 elementary, after school, middle school.
 12 Q Is he able to drive?
 13 A Yes, he can drive. He has a prosthetic leg.
 14 Q Okay. And then, so, you go to PCSSD, you start
 15 there, I'm assuming, July 1, 2013?
 16 A 2012. It was actually July 9th, 2012.
 17 Q Oh, excuse me. Yes, I got that. Exactly. All
 18 right. So, I'm going to put July 1 of 2012 through
 19 July 1 of 2018.
 20 A Yes.
 21 Q All right. Or actually, I guess, it would be
 22 like June 30th of 2018.
 23 A Yes, June 30th was my last day.
 24 Q So, six years in the district?
 25 A Yes.

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1 Q And you started out in what position at PCSSD?
 2 A Instructional technology specialist.
 3 Q Is that the same position you held up until your
 4 termination?
 5 A No.
 6 Q What did you call it, instructional what?
 7 A Instructional technology specialist.
 8 Q Was that Central Office?
 9 A Yes.
 10 Q All right. So, what were the various positions
 11 you held?
 12 A I was a school improvement specialist.
 13 Q After instructional?
 14 A After.
 15 Q So, instructional technology specialist, then
 16 you became a school --
 17 A Improvement specialist. I still kept my duties
 18 that I had with instructional technology.
 19 Q Then, what?
 20 A Then I was a dyslexia therapist, I assisted with
 21 the dyslexia.
 22 Q Was that full-time dyslexia therapist?
 23 A It was all while we were working. Doctor Pride
 24 was over dyslexia, and she recruited me to help her.
 25 So, we tested kids, and we did intervention with kids,

<p style="text-align: right;">Page 17</p> <p>1 alongside of our full-time job. 2 Q I will ask your duties. But just looking at 3 your title, you were instructional technology 4 specialist? 5 A Uh-huh. (Indicated yes.) 6 Q Then, your title went to school -- 7 A School improvement specialist. 8 Q And while doing that, you were a dyslexia 9 therapist? 10 A Yes. And then, my last official title was 11 program administrator for K-12 science. 12 Q K-12 science? 13 A Yes. 14 Q All right. So I'm clear, in your six years, you 15 held three titles? 16 A Yes. 17 Q Instructional technology specialist? 18 A Yes. 19 Q School improvement specialist? 20 A Yes. 21 Q And then, program administrator, K-12, science? 22 A Yes. 23 Q Aside from your pay increasing because of the 24 steps, did it increase because of rank? 25 A Well, it actually went down when I went to</p>	<p style="text-align: right;">Page 18</p> <p>1 school improvement specialist, and then it went up 2 like a little bit, \$3,000.00, probably, when I became 3 program administrator, because I was on a different 4 pay scale. 5 Q Okay. 6 A Administrative support staff and then certified 7 administrator. So, my first job was higher paying. 8 Q It was admin? 9 A Yeah. Both of them were, but it was support 10 admin. It was a different scale. 11 Q Okay. I have your contract the last year you 12 worked. It says you made \$76,546.65? 13 A Uh-huh, yeah. And I had just got back up to 14 that. Because I made \$76,000.00 when I first got 15 there. 16 Q Okay. 17 A I made \$72,000.00, then \$76,000.00. It went up 18 to \$78,000.00, then it dropped back down to 19 \$71,000.00, and then it got back up to \$76,000.00 my 20 last contract year. 21 Q Okay. 22 (WHEREUPON, Exhibit Number One was 23 marked for identification.) 24 BY MR. KEEs: 25 Q When you were the instructional technology</p>
<p style="text-align: right;">Page 19</p> <p>1 specialist, who did you report to? 2 A Will Reid. Well, first it was Susan, Susan -- 3 Lord have mercy. Susan, Susan, Susan. I cannot 4 remember her last name. 5 MR. KEEs: Do you remember? 6 MS. BURGESS: Fletcher. 7 THE WITNESS: Thank you. 8 BY MR. KEEs: 9 Q Susan Fletcher? 10 A Susan Fletcher. 11 Q She can't testify for you, but she can help you. 12 A I know. But thank you for asking her. 13 Q She can help you. Susan Fletcher, then Will 14 Reid? 15 A Then Will Reid, yes, sir. 16 Q That was all your -- those were your only two 17 supervisors? 18 A No, sir. 19 Q Oh. 20 A When I became -- 21 Q No. I'm just talking about the instructional. 22 A Oh, yes, sir, that was the only two. 23 Q And where did this department report to? 24 A First it was Learning Services and we reported 25 to the elementary and secondary director. And then,</p>	<p style="text-align: right;">Page 20</p> <p>1 we moved to Information Technology, that's when I was 2 under Will Reid, and we reported directly to Will 3 Reid. 4 Q Okay. All right. Let's go to school 5 improvement specialist. Was that always under 6 Learning Services? 7 A It was Learning Services, yes, and we reported 8 to the deputy superintendent. 9 Q Doctor Bednar? 10 A Yes, sir. 11 Q So, that was your direct report? 12 A Yes, sir. 13 Q The entire time you held that position? 14 A Yes, sir. 15 Q And then, were you reporting to Doctor Pride 16 with dyslexia? 17 A No. I assisted her. 18 Q Okay. 19 A But we were like lateral. 20 Q I got you. And then, program admin? 21 A I reported to two directors, Doctor Tackett for 22 secondary director, and Ms. Linda Goodwin for 23 elementary. 24 Q Okay. Were you just there one year in that 25 position?</p>

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1 A Yes, That was my last year.
 2 Q Your last year was program admin?
 3 A Yes, that was my last year.
 4 Q Goodwin?
 5 A Yes.
 6 Q All right. I'm going to use the term
 7 "termination". So, that's a legal term, it's not
 8 implying that you were terminated, nonrenewed, that's
 9 for me and John to argue about. That's what I mean.
 10 I'm going to say "terminated".
 11 A Okay.
 12 Q All right. Following your termination from
 13 PCSSD, it looks like you did a whole lot of stuff.
 14 So, walk me through what positions or jobs you took
 15 and now hold.
 16 A So, educational consultant for McGraw Hill,
 17 that's a contracted position. And another contracted
 18 position --
 19 Q McGraw Hill, that's \$37.00 an hour?
 20 A Yes, \$37.50.
 21 Q \$37.50. Do you know about -- are you paid
 22 weekly, monthly?
 23 A Whenever I do a job. So, sometimes it may be
 24 once a month, sometimes maybe twice, sometimes five
 25 times a month. It's not a steady.

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1 Q What do they -- you are an independent
 2 contractor?
 3 A Yes.
 4 Q So, do they send you over like a W-9?
 5 A W-9, yes.
 6 Q Would you have had a W-9 issued for 2018?
 7 A Yes.
 8 Q And then, you will have one issued for 2019?
 9 A Yes.
 10 Q Do you remember what your W-9 was for calendar
 11 year '18?
 12 A I don't. No.
 13 Q Okay. Well, I will request that from John, just
 14 so I can see what your earnings were. But do you
 15 think it was -- let's say for this year, do you
 16 anticipate making under \$10,000.00, over \$10,000.00?
 17 A Under.
 18 Q Under?
 19 A Yeah, I had surgery, so under.
 20 Q And what do you do, kind of in a nutshell?
 21 A I provide professional development. When they
 22 buy products from McGraw Hill, I go in and provide
 23 professional development products on any books or
 24 technology programs that they purchase.
 25 Q Okay.

Page 23

1 A And sometimes I just visit the school just to
 2 follow up. So, that's basically what I do.
 3 Q You had surgery. And in deposition, this is an
 4 opportunity for me to kind of get to know more about
 5 what is going on in your life. That doesn't
 6 necessarily mean we will talk about it in front of a
 7 jury. But what kind of surgery did you have?
 8 A It was supposed to be a hernia surgery, but it
 9 ended up my uterus was lodged in a scar.
 10 Q It was what?
 11 A My uterus.
 12 Q Yes.
 13 A Was lodged in a scar that I had from previous
 14 C-sections. And so, they removed two cysts instead of
 15 just the hernia. So, it caused me to be out, instead
 16 of four weeks, eight weeks.
 17 Q You were out for eight weeks?
 18 A Yes.
 19 Q And you had that surgery when?
 20 A July 24th.
 21 Q Okay.
 22 A My first day stepping back really into a school
 23 was, I think, September 18th, I think. It was
 24 sometime in September.
 25 Q Were you at the depositions that John took at

Page 24

1 the district?
 2 A I was.
 3 Q So, was that before July 24th?
 4 A It was in June.
 5 Q Okay.
 6 A It was about a month and a half before.
 7 Q Are you fully recovered now?
 8 A No.
 9 Q Are you still missing work?
 10 A I'm not traveling as much. And you didn't ask
 11 me about the other place.
 12 Q Okay.
 13 A But I do schedule -- I do have scheduled visits
 14 for schools. I thought I had some contracts with
 15 PCSSD, but they fell through. So, I have to revamp
 16 now.
 17 Q So, McGraw, do you travel outside of Little
 18 Rock?
 19 A Yeah, across -- like from Little Rock and up to
 20 east Arkansas, that's her territory, my rep's
 21 territory. So, I could travel in Brinkley or Lake
 22 Village.
 23 Q Little Rock, all the east side of the state?
 24 A All the east side, north, south, and east of
 25 Little Rock.

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<p>1 Q Okay.</p> <p>2 A She calls them "A", "B", "C" districts. But the</p> <p>3 smallest district is a thousand, and her largest</p> <p>4 client is Little Rock School District.</p> <p>5 Q Is Pulaski County a client?</p> <p>6 A It's a client, yes.</p> <p>7 Q So, do you go into Pulaski County for McGraw</p> <p>8 Hill?</p> <p>9 A Sometimes I will, because they have corrective</p> <p>10 reading. And so, I may check on them for that.</p> <p>11 Q Do you get paid for your travel?</p> <p>12 A Yes.</p> <p>13 Q So, it's \$37.50 for --</p> <p>14 A No. It's different.</p> <p>15 Q Okay.</p> <p>16 A \$37.50 if I'm doing a PD. If I'm traveling just</p> <p>17 to go somewhere, they pay mileage plus the time I have</p> <p>18 to travel, I think it's like \$12.00 or \$13.00 an hour.</p> <p>19 And if I'm just going to talk to someone, or e-mail,</p> <p>20 it's \$15.00 an hour. So, it's different.</p> <p>21 Q Sure. All right. So, your other employment, I</p> <p>22 have as Arkansas AIMS?</p> <p>23 A Yes. It's Arkansas AIMS. And it stands for</p> <p>24 Math and Science Initiative.</p> <p>25 Q Is the "A", what does that stand for?</p>	<p>1 A I have forgot.</p> <p>2 Q So it's A-I-M-S, and it's math and science?</p> <p>3 A Initiative, yes.</p> <p>4 Q Who --</p> <p>5 A I should know that.</p> <p>6 Q Who is over it? I mean, what is this?</p> <p>7 A It's a nonprofit organization that's housed at</p> <p>8 UALR. And they get their ideas from National Math and</p> <p>9 Science Initiative in Dallas, Texas. So, they started</p> <p>10 out with AP, providing services for AP teachers and</p> <p>11 pre-AP. I came in last year because they just started</p> <p>12 with middle schools, and Horace Mann and Mills Middle</p> <p>13 was their first two middle schools. Now, I also see</p> <p>14 North Little Rock Middle School, sixth grade campus</p> <p>15 and seventh and eighth grade campus.</p> <p>16 Q Who funds Arkansas AIMS?</p> <p>17 A It's a nonprofit. They have a Board, so they</p> <p>18 get donations from various people. And then, they are</p> <p>19 housed at -- it's a U of A type of system, you know,</p> <p>20 it's grant funded.</p> <p>21 Q Right. You don't know of a particular family?</p> <p>22 A No, I don't. It's grant funded.</p> <p>23 Q So, your rate of pay, it's by the day, \$250.00 a</p> <p>24 day?</p> <p>25 A It's by day, yes. If I stay a full day is</p>
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Page 29

1 three to four days, two were for AIMS, and then the
 2 others were from my company. Sometimes -- and I
 3 volunteer after school tutoring. That was volunteer.
 4 Q So, with The Learning Tree, are you paid by the
 5 district?
 6 A No. I was paid from her school through funds,
 7 yes.
 8 Q Through funds allocated to Mills Middle?
 9 A Allocated to Mills Middle, yes.
 10 Q Is that the only school you are servicing as The
 11 Learning Tree?
 12 A Well, this year, I'm not servicing any schools.
 13 I was asked to service four schools, but then I was
 14 told that I couldn't do it because of conflict of
 15 interest.
 16 Q What schools -- who asked you to service
 17 schools?
 18 A Mills Middle, Lisa Watson, Doctor Yvette
 19 Dillingham from Harris Elementary School, Ms. Masako
 20 Christian at Lawson Elementary, and Ms. Felicia
 21 Hamilton at Clinton Elementary School.
 22 Q They asked that you service their schools
 23 through your company?
 24 A Yes. They asked either through e-mail or phone
 25 call. And I e-mailed them a proposal. I e-mailed --

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1 Ms. Watson, Mills Middle School, I e-mailed her May
 2 2019, and it was approved last year. And so, I
 3 planned my year based on my schools and my time,
 4 because it's me. We also do ACT prep, but I have a
 5 team. But schools, it's me, I go to the schools.
 6 Q And who told you about a conflict of interest?
 7 A The principals told me that they were told by
 8 Ms. Smith that it was a conflict of interest due to
 9 the lawsuit that we have, so I wouldn't be able to
 10 provide services for them. And I said, "Okay."
 11 Q Who gave you that information, Lisa?
 12 A Ms. Lisa Watson, Ms. Masako Christian, Doctor
 13 Yvette Dillingham, at three different times. I
 14 e-mailed Ms. Hamilton to follow up to see if I could
 15 -- when I was going to her school, to tell her the
 16 day, she didn't e-mail me back.
 17 Q So, three of the four --
 18 A Three of the four told me that.
 19 Q -- told you that it was a conflict?
 20 A Yes, that they were told it was a conflict.
 21 Q And they routed that back to Ms. Smith?
 22 A Well, Ms. Watson, Doctor Bell came and told her
 23 that Ms. Smith told him to tell her.
 24 Q Okay.
 25 A But the other two specifically said that they

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1 had a conversation with her. Because we were getting
 2 ready -- I was getting ready to go. And I had gone to
 3 Harris Elementary and planned with another consultant
 4 for one day.
 5 Q Okay.
 6 A And so, I stopped.
 7 Q So, this school year, what schools does The
 8 Learning Tree service?
 9 A No one. We service students for ACT prep this
 10 year.
 11 Q So, I mean, I know you wouldn't know this. But
 12 do you anticipate your 2019 total earnings, do you
 13 have a number?
 14 A I had a number, but now I don't have a number.
 15 I mean, I have to revamp, I have to start back over.
 16 Q Okay. What had you anticipated the number to
 17 be?
 18 A \$60,000.00.
 19 Q But it will be less than that?
 20 A It will be less, yes, sir.
 21 Q Okay. All right. So, like tomorrow, what does
 22 a typical day look like for you now that you are
 23 recovered from your surgery?
 24 A Well, tomorrow I actually will be going to Mills
 25 Middle School for Arkansas AIMS to provide -- because

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1 I provide math and science. So, tomorrow is a science
 2 day.
 3 Q Okay.
 4 A So, I will go in and work with teachers, observe
 5 them, we will meet, talk about our next step, model
 6 for them. That's my typical day. I model for
 7 teachers, I work with kids. We look at the data, we
 8 make plans. I actually planned with them this summer
 9 because they had over a ten percent growth in the
 10 Science Department. Well, ten percent in seventh
 11 grade, like five percent in like sixth grade, and five
 12 percent, something like that, in eighth grade. So, it
 13 was growth.
 14 Q At Mills Middle?
 15 A At Mills Middle in science. That was my
 16 targeted area last year. So, we planned based on
 17 that, based on the work we did last year.
 18 Q What are you doing for insurance now?
 19 A I was paying my insurance, \$665.00 for private
 20 insurance. I'm not going to be able to meet that
 21 premium this month. So --
 22 Q So, that's your family plan?
 23 A For myself and my children. Of course, my
 24 husband gets his insurance through disability.
 25 Q Who are your kids covered through?

<p style="text-align: center;">Page 33</p> <p>1 A Through me, through my private insurance. The 2 \$665.00 covers me and four children. 3 Q You listed Doctor Keith Cooper as a doctor that 4 you saw regarding issues that you raise in your 5 Complaint. Is that accurate? 6 A That's just my doctor, so if you need my medical 7 records. 8 Q Well, I don't need them unless you treated 9 because of some type of issue related to this lawsuit. 10 A No. I mean, I go to him for high blood 11 pressure. I had it before. It's kind of hereditary. 12 Q Well, you know, in employment cases, the reason 13 I ask is, sometimes employees will say, "The loss of 14 my job caused me, you know, anxiety or medical 15 issues." Is there any of that that happened for you? 16 A No. 17 Q Okay. 18 A I mean, my body is just -- no. 19 Q So, none of your medical issues were exacerbated 20 or worsened after your termination from Pulaski 21 County? 22 A He put me on a stronger dosage, but I can't 23 honestly say that was it. I'm not going to say that 24 was it. 25 Q Stronger dosage of what?</p>	<p style="text-align: center;">Page 34</p> <p>1 A For my high blood pressure. 2 Q Are you still actively looking for employment in 3 a nonconsulting role? 4 A I haven't, no, not this year. Like I said, I 5 actually have to start back over. So, it's going to 6 have to get to that if I don't get back into the 7 regular routine of making a salary I'm used to making 8 for my family. 9 Q So, do you have like a time that you have given 10 yourself, if you can't build your company, you are 11 going to go look for something else? 12 A Yes. Yes, because I actually spoke to probably 13 like 35 to 40 college recruiters for ACT -- it was 14 called Improving Your ACT Scores, I was asked to speak 15 to them. And I got ten potential clients from that. 16 So, if that doesn't pan out -- if I can't secure a 17 contract, I have given myself until December, I will 18 get back out there looking. I might be before then, 19 because I have to take care of my family. 20 Q Sure. 21 A I have a daughter in college. So, we are going 22 into our savings now, you know. 23 Q So, you have given yourself this self-imposed 24 deadline of December to build up your LLC? 25 A Yes.</p>
<p style="text-align: center;">Page 35</p> <p>1 Q And if not, then you are going to look to what? 2 A Start back again. What was your question? 3 Q Like a teaching position? 4 A I actually looked for a teaching position. I 5 haven't been blessed to get back in -- people tell me 6 I don't belong in a classroom, that I should be out 7 there helping people. So, I mean, I don't mind 8 teaching. I wasn't offered a teaching position. I 9 applied to Little Rock for a pre-K. I think you may 10 see that in there. 11 Q Yes, I see the list. 12 A And I have applied for several things that I 13 have experience, not only certification and 14 qualification, but experience. I don't know why I 15 didn't get asked to be a classroom teacher. 16 Q Did you apply at PCSSD for a classroom position? 17 A I wasn't offered the opportunity, because the 18 thing -- but this is -- I have been nonrenewed before 19 because of instructional technology, and that's how I 20 got school improvement specialist that was offered. I 21 also was offered classroom teacher, but I was school 22 improvement specialist. But this time, nothing was 23 offered. I asked for my bumping rights, I wrote a 24 letter to get my bumping rights, because that's how 25 PCSSD typically does things. It was not offered to</p>	<p style="text-align: center;">Page 36</p> <p>1 me, said that they weren't following that policy this 2 year. So, I applied for different jobs there, I 3 didn't get an interview for any of them. I was told 4 that I couldn't apply for principal -- well, Doctor 5 Pride and I were told we couldn't apply for principal. 6 One year it said you could be district administration 7 or have two years. That year, it was only two years. 8 I asked why they just decided to change it. 9 Q Well, let's back up. 10 A Okay. 11 Q So, all six years you were in the district, was 12 that considered district level? 13 A Yes, it was, not classroom. I never taught in 14 Pulaski County. 15 Q Right. Okay. So, are you aware after the five 16 program administrators were eliminated that then there 17 were two instructional strategist positions created? 18 A Yes. I didn't apply for that job. 19 Q So, my question is, why did you not apply for 20 the instructional strategist position that was opened 21 in the summer of 2018? 22 A Because when I read that it was the same job I 23 did, and I didn't want to apply for it, because it was 24 more responsibilities with, it seemed to be, less pay. 25 because you had to start back over. It didn't make</p>

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1 sense to me.
 2 Q So, you read the -- what do you call when you
 3 put it online, advertisement?
 4 A Well, Doctor McNulty actually -- when he visited
 5 with us, actually went over that job description with
 6 us --
 7 Q Okay.
 8 A -- in a meeting that he had with me and the
 9 other program administrators and shared that with us.
 10 Q Okay.
 11 A It was basically the same job description.
 12 Q And he had made changes to the title?
 13 A The title, yes.
 14 Q And did he make any changes to the duties?
 15 A It was the same duties, from my recollection.
 16 Q So, he said, "This is a new position that I'm
 17 creating"?
 18 A Yes.
 19 Q Okay. And he invited you to apply for it?
 20 A Yes. And I not only applied for that, but other
 21 positions that were open.
 22 Q Wait, you did not apply for that?
 23 A Did not apply for what?
 24 Q The instructional strategist position?
 25 A I didn't. I applied for the other positions

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1 that he asked us to apply for.
 2 Q Okay. Let me make sure I'm hearing you. You
 3 said you did not?
 4 A I did not, no.
 5 Q And what is the reason, again, that you did not
 6 apply for it?
 7 A Basically, I didn't want to. It was the same
 8 job description. I didn't understand being cut from
 9 that position, having the same position, but you're
 10 going from five to two. It didn't make any sense to
 11 me, professionally.
 12 Q Okay.
 13 A Although I thought I probably could do it, but
 14 two people doing it with a district size of 12,000
 15 plus students, it would be -- I wouldn't say
 16 impossible, but very hard. I would have had to work
 17 day and night.
 18 Q Were you qualified for it?
 19 A Yes.
 20 Q And he invited you to apply?
 21 A Yes.
 22 Q Okay. Were there other -- okay. The meeting
 23 with McNulty, was that attended by you and who else?
 24 A Well, we had two meetings with him. The first
 25 meeting it was me, Doctor Pride, Brandy Beckman, Leta

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1 Ray - Bobette Kelly the same person, and Nicole
 2 Townsend. That was the first meeting. And then,
 3 before he --
 4 Q Was this meeting that you had with him, the
 5 first one, was it before or after your hearing that
 6 you had in front of the Board?
 7 A It was before.
 8 Q Was that over the phone or in person?
 9 A In person.
 10 Q Tell me about that meeting.
 11 A He met with us and he told us that he was coming
 12 in and making changes, it was strictly fiscal, meaning
 13 that the district had to cut \$5 to \$8 million. And
 14 so, that's why our positions were being cut. And he
 15 was trying to restructure, and maybe he would
 16 restructure and he would try to get three of us,
 17 hopefully four, but he would see what he could do.
 18 But he encouraged us to reapply. And maybe -- that's
 19 the day maybe when he asked us to bring our job
 20 descriptions, or exactly what we did. So, he had
 21 planned just to have that meeting, but he requested
 22 another meeting with us.
 23 Q So, this first meeting, it was after you had
 24 been given your letter on May 1st that your --
 25 A It was before we were given our letter.

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1 Q Before?
 2 A We were told we were being cut, but it was
 3 before.
 4 Q So, that was in late April?
 5 A It probably was April 30th. It probably was.
 6 Q April 30?
 7 A Because the second meeting was probably May 2nd,
 8 something around there.
 9 Q So, the first meeting was before you had
 10 received your letter from Doctor Warren?
 11 A Yes.
 12 Q Official Notice of Nonrenewal letter?
 13 A Yes, I believe it was, yes. Because I remember
 14 -- it might have been before, it might have been the
 15 day. I was remembering they were in a scurry trying
 16 to get it done before May 1st.
 17 Q Was it a Friday before the Saturday Board
 18 meeting?
 19 A When was the Saturday Board meeting, was it
 20 April 16th or April --
 21 Q No, no. It was April 30th, or 31st.
 22 A April 31st? April --
 23 Q Hold on.
 24 A Can I ask Ms. Townsend about the date, because
 25 she remembers better than I do.

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<p>1 Q Yes.</p> <p>2 MR. KEES: Go off real fast.</p> <p>3 (WHEREUPON, a brief discussion was held</p> <p>4 off the record.)</p> <p>5 THE WITNESS: She said the Board meeting</p> <p>6 -- did you hear her?</p> <p>7 BY MR. KEES:</p> <p>8 Q Yes, you go ahead and say it.</p> <p>9 A Okay. She said the Board meeting was April</p> <p>10 28th, and we met with him April 30th, and we received</p> <p>11 the letter April 30th, after we met with him.</p> <p>12 Q Okay.</p> <p>13 A I knew we met with him before we got our letter.</p> <p>14 Q Got it.</p> <p>15 A Because, you know, I still thought, "We don't</p> <p>16 have our letter yet, there is still some hope." And</p> <p>17 the 28th, that was the day.</p> <p>18 Q Were you at the Board meeting on the 28th?</p> <p>19 A I was.</p> <p>20 Q So, were you aware that, while not official, you</p> <p>21 anticipated that a nonrenewal letter was coming?</p> <p>22 A Well, I didn't, because Doctor Warren testified</p> <p>23 at the meeting that she didn't recommend it, she</p> <p>24 didn't want to do it.</p> <p>25 Q Right.</p>	<p>1 A And the Board told her, "We know you don't want</p> <p>2 to do it, we know it's not your plan, but it's our</p> <p>3 plan, and we are telling you to sign this letter."</p> <p>4 Q Okay.</p> <p>5 A So, that's why -- I mean, I know school law and</p> <p>6 I know if the superintendent doesn't recommend or</p> <p>7 sign, it's not legal. And I know that the School</p> <p>8 Board cannot do that.</p> <p>9 Q So, then, you had a meeting. Was anybody else</p> <p>10 in the meeting on the 30th besides the five program</p> <p>11 administrators and Doctor McNulty?</p> <p>12 A No, sir.</p> <p>13 Q No other staff?</p> <p>14 A No other staff, no other administrators, no,</p> <p>15 sir.</p> <p>16 Q Okay. All right. You said they invited you to</p> <p>17 apply for the instructional strategist. And did he</p> <p>18 give you the job description at that time for the</p> <p>19 instructional strategist position?</p> <p>20 A He was talking about it, and he asked us for our</p> <p>21 jobs. The second meeting, he gave -- he showed us on</p> <p>22 paper --</p> <p>23 Q Okay.</p> <p>24 A -- this one, that's when we read it and saw it</p> <p>25 on paper.</p>
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<p>1 Q All right. At that April 30th meeting with</p> <p>2 Doctor McNulty, did he tell you about other positions</p> <p>3 that were open?</p> <p>4 A Yes. He told us about the Deputy Superintendent</p> <p>5 of Curriculum, he said, I believe -- he said, may not</p> <p>6 be a direct quote, but something like, "I believe we</p> <p>7 have some principal positions." Because I know I</p> <p>8 applied for the pre-K-four director, I have experience</p> <p>9 in pre-K certified early childhood teacher. So, I</p> <p>10 applied for that job.</p> <p>11 Q So, tell me what jobs you applied for.</p> <p>12 A I applied for -- I think I applied for Federal</p> <p>13 Programs, I was certified, qualified for that.</p> <p>14 Q Hold on. Federal programs?</p> <p>15 A Yes.</p> <p>16 Q That Doctor Bell received?</p> <p>17 A Yes.</p> <p>18 Q Did you get an interview?</p> <p>19 A No, I didn't.</p> <p>20 Q So, you are saying that you applied online for</p> <p>21 the Federal Programs director position?</p> <p>22 A Yes.</p> <p>23 Q And you did not get an interview?</p> <p>24 A Yes. And the day before -- I didn't get an</p> <p>25 interview, but I knew they were having interviews. I</p>	<p>1 think I pulled mine the night before the interview.</p> <p>2 Then, before that, I applied for the pre-school</p> <p>3 director's position.</p> <p>4 Q Pre-school director. Over the entire pre-K?</p> <p>5 A Yes.</p> <p>6 Q The one that Nicky is in?</p> <p>7 A Yes. I didn't get an interview for that.</p> <p>8 Q Pre-K director, no interview?</p> <p>9 A No interview.</p> <p>10 Q But you submitted everything online?</p> <p>11 A Yes, I did.</p> <p>12 Q All right. What else?</p> <p>13 A And I told you about the Federal Programs?</p> <p>14 Q Federal Programs and pre-K.</p> <p>15 A Yes. And I -- I mean, I wasn't qualified, but I</p> <p>16 did apply for Deputy Superintendent of Curriculum.</p> <p>17 But I didn't expect to interview for that, but I did</p> <p>18 apply online for that, just the experience of doing</p> <p>19 it.</p> <p>20 Q Did you apply for any principals' positions?</p> <p>21 A I was told I couldn't apply for it.</p> <p>22 Q By who?</p> <p>23 A I was told by Shawn Burgess. Because we</p> <p>24 received the e-mail on -- we received an e-mail from</p> <p>25 Doctor Warren, I can't remember the exact date.</p>

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<p>1 telling us it was closed, but she wanted us to apply 2 because Doctor McNulty invited us to apply.</p> <p>3 Q Yes.</p> <p>4 A That was like after he talked to us. So, she 5 told us to go talk to Kim -- e-mail Kim White.</p> <p>6 Q Right.</p> <p>7 A So, Kiffany, Doctor Pride wasn't there that day, 8 I told her, "Hey, you are not here, but you have to do 9 this right now. So, you have to" -- I forwarded her 10 the e-mail that Doctor Warren sent us, just to make 11 sure she got it. And I e-mailed Kim, Kim told me what 12 to do, and I went down there to talk, and she said, 13 "Well, you need to talk to Shawn." So, Shawn was 14 like, well, you know, she told me the job description 15 said two years of assistant principal position. And I 16 said, "Okay. But last year, which was 2017, it had 17 district administration or two years, what was the 18 difference?" She said, "Well, we just decided, you 19 know, as a team to go back to two years." I said, 20 "Okay," and I walked away.</p> <p>21 Q So, the meeting that Doctor McNulty encouraged 22 you to apply for principal, was that that first 23 meeting that you had with him, April 30th?</p> <p>24 A Yes. It was both of the meetings.</p> <p>25 Q Okay. When was the second meeting with McNulty?</p>	<p>1 THE WITNESS: It was May 2nd or May 1st? 2 MS. TOWNSEND: May 2nd at that time.</p> <p>3 THE WITNESS: May 2nd, it was May 2nd.</p> <p>4 BY MR. KEES:</p> <p>5 Q I guess he had been on campus the entire time?</p> <p>6 A Yes. He was visiting schools and meeting with 7 people.</p> <p>8 Q What was that meeting about?</p> <p>9 A Because the first meeting, he told us about the 10 position, the second meeting, he actually showed us.</p> <p>11 Q Was it with the same attendees?</p> <p>12 A Except for Ms. Townsend, Nicole Townsend.</p> <p>13 Q She couldn't be there?</p> <p>14 A She couldn't be there.</p> <p>15 Q But administration-wise, it was just Doctor 16 McNulty?</p> <p>17 A Just Doctor McNulty.</p> <p>18 Q And it was four program administrators, 19 including yourself?</p> <p>20 A Yes.</p> <p>21 Q And he had a job description for the 22 instructional strategist?</p> <p>23 A Yes. It was a draft.</p> <p>24 Q And again, he encouraged you to apply for it?</p> <p>25 A Yes.</p>
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<p>1 Q And then, did he mention the other positions?</p> <p>2 A Yes, he did.</p> <p>3 Q Anything else notable about that meeting?</p> <p>4 A No, not notable.</p> <p>5 Q Anything else you recall from the meeting?</p> <p>6 A I mean, the same story about fiscal -- it 7 totally being fiscal. But it was his decision, he 8 just wanted to restructure some things. And he talked 9 about his experience in Waterloo working with 10 department heads. And we talked about -- I do 11 remember -- I think it was the first meeting, I do 12 remember asking him about online summer school, 13 because I administered that and was over teachers, I 14 asked him about that, what would happen. Because we 15 were kind of like -- we knew Doctor Warren was the 16 superintendent, but he was talking to us. So, I'm 17 like, I asked him, "Do I still plan for that or what 18 do I do?" And he said he would have to get back with 19 us, but for sure talk to Doctor Warren about it.</p> <p>20 Q Did he ever say that it was his decision to 21 restructure this program administrator to the 22 instructional strategist?</p> <p>23 A He said it was his decision to restructure. 24 period.</p> <p>25 Q Okay. Was he referring to the Learning</p>	<p>1 Services?</p> <p>2 A Yes, to program administrators the way it was 3 set up, yes.</p> <p>4 Q He said that was his decision to restructure?</p> <p>5 A Yes. He said it was based on -- it was fiscal.</p> <p>6 Q And then, in addition to fiscal, did he talk 7 about things he wanted to implement from his prior 8 administrative experience?</p> <p>9 A Not necessarily implement. But he just told us 10 some things he did, dealing with department chairs. 11 I'm saying this because it's a school district that is 12 doing what he said, how department chairs would kind 13 of like be more over teachers as far as leading 14 teachers, instructional coaches.</p> <p>15 Q Okay.</p> <p>16 A Which, as a science program administrator, 17 that's all who I worked with.</p> <p>18 Q Okay.</p> <p>19 A I worked with the department chairs. So, I was 20 like, "Yeah, it makes sense to me, that part does."</p> <p>21 But it's things like that, about helping -- continuing 22 to improve achievement.</p> <p>23 Q And are those the only two times you met with 24 Doctor McNulty?</p> <p>25 A Before our termination, yes.</p>

<p style="text-align: right;">Page 49</p> <p>1 Q Before the hearing?</p> <p>2 A Yes, before the hearing. I'm reflecting. While</p> <p>3 I was still working there, he was -- we had an AIMS</p> <p>4 training for elementary teachers, and he was at</p> <p>5 Maumelle Middle, I spoke to him.</p> <p>6 Q But not about this position?</p> <p>7 A No, no.</p> <p>8 Q So, in terms of talking to him about you working</p> <p>9 at Pulaski County, it was just these two meetings?</p> <p>10 A Yes, sir.</p> <p>11 Q Okay. And at either of those meetings did he</p> <p>12 ever talk about race, ethnicity, equity, any of those</p> <p>13 things?</p> <p>14 A He did, yes.</p> <p>15 Q Tell me about that.</p> <p>16 A Because that was our determining factor as a</p> <p>17 team, was to Plan 2000, you know, increasing</p> <p>18 achievement. We knew that we had to -- that was one</p> <p>19 of the areas we had to work on in Facilities. So, we</p> <p>20 asked him about that. He talked about racial</p> <p>21 disparity. He called it -- he didn't say "disparity".</p> <p>22 It started with an "M". Because I wondered why he</p> <p>23 used that term.</p> <p>24 MS. TOWNSEND: Marginalize.</p> <p>25 BY MR. KEES:</p>	<p style="text-align: right;">Page 50</p> <p>1 Q Marginalized?</p> <p>2 A Yes.</p> <p>3 Q Or marginalization?</p> <p>4 A Yes, instead of disparity. Thank you. And I</p> <p>5 questioned to myself why he used that term. Because</p> <p>6 my thing is, there is a disparity between blacks and</p> <p>7 nonblacks in Pulaski County that was obvious to me,</p> <p>8 being in both of the districts. It was very apparent</p> <p>9 at PCSSD.</p> <p>10 Q So, you talked about those issues with him?</p> <p>11 A Well, briefly, yes.</p> <p>12 Q Okay.</p> <p>13 A "This is what we do, this is why we are doing</p> <p>14 it. We have seen an increase in growth," just talking</p> <p>15 to him about that. And then, he started talking about</p> <p>16 his experience with Waterloo and the way it was</p> <p>17 structured in Waterloo, which I have looked it up and</p> <p>18 that's a -- you know, because when you are being told</p> <p>19 you are being nonrenewed, terminated, or whatever, you</p> <p>20 look and see who is coming in, what is the structure</p> <p>21 there. So, in my mind, I'm trying to see, is this</p> <p>22 where you are going.</p> <p>23 And we asked him about things like that, you</p> <p>24 know, "I notice you have this and that." Like they</p> <p>25 had a Director of Secondary. I believe he was over</p>
<p style="text-align: right;">Page 51</p> <p>1 the high schools in Waterloo, because he was over</p> <p>2 Curriculum. So, he had a middle school person and</p> <p>3 then an elementary person, and he was over the high</p> <p>4 schools as the Superintendent of Curriculum. So,</p> <p>5 that's what I remember from researching. And so, I</p> <p>6 was curious about that, is that, you know, "I notice</p> <p>7 you had this. Is that what you plan on doing here?"</p> <p>8 Pulaski County was a little bit larger. 2,000</p> <p>9 may not seem like a lot, but that's a lot of kids.</p> <p>10 That's like four elementary schools more, maybe two</p> <p>11 more high schools, maybe three more middle schools.</p> <p>12 So, I'm a numbers person, that's what I work with day</p> <p>13 to day to instruct, so I'm always thinking about</p> <p>14 things like that. So, just curious about, you know,</p> <p>15 "What would you do different than what we are doing</p> <p>16 now?" Because our job was to close this gap, you</p> <p>17 know, amongst black and nonblack students. That's</p> <p>18 what we talked about every day. Every day we met,</p> <p>19 that's all we talked about.</p> <p>20 Q Okay. Thank you. So, let me ask a more</p> <p>21 specific question. In the context of race, equity,</p> <p>22 did he ever say that his decision to nonrenew the</p> <p>23 five program administrators and then restructure to</p> <p>24 two instructional specialists, did he ever say that</p> <p>25 was because of the race or ethnicity of the</p>	<p style="text-align: right;">Page 52</p> <p>1 employees?</p> <p>2 A Not to -- no, he didn't say that specifically,</p> <p>3 no.</p> <p>4 Q Okay. What do you mean by "specifically"? Has</p> <p>5 he said it unspecifically?</p> <p>6 A I mean, he said it was fiscal, that's what he</p> <p>7 said.</p> <p>8 Q Okay.</p> <p>9 A That's what he said.</p> <p>10 Q I mean, my question is really a direct one. Did</p> <p>11 he ever say anything to the extent of, "Ms. Beasley,</p> <p>12 because of you being African-American, that played</p> <p>13 into my decision"?</p> <p>14 A No, he didn't say that.</p> <p>15 Q And I wouldn't think he did, but I just wanted</p> <p>16 to make sure.</p> <p>17 A Yeah. He didn't say that directly, yeah -- or</p> <p>18 indirectly, he didn't say it.</p> <p>19 Q Do you know what the term "animus" means, bad</p> <p>20 feelings, hard feelings? Did he show any racial</p> <p>21 animus in any of these meetings?</p> <p>22 A I was feeling like it was -- and I probably</p> <p>23 said, "I know it's not directly you," but I was</p> <p>24 feeling animus feelings about the decision. Because</p> <p>25 it had nothing to do with performance or fiscal.</p>

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<p>1 Q Right. So, you agree it had nothing to do with 2 performance?</p> <p>3 A I agree with that.</p> <p>4 Q And where did you feel this animus was coming 5 from?</p> <p>6 A Just the series of things that happened. Like 7 I'm comparing two different districts, because I 8 didn't teach in Pulaski County, but I definitely see a 9 disparity amongst expectations with students, namely, 10 black students and low performing students. I don't 11 have the same idea or concept, because I worked with 12 -- when I work with kids, they are going to grow, they 13 are expected to grow one year. And I felt like just 14 because of the disparity in the buildings, that I had 15 animus feelings about race. I voiced that out in a 16 principal's meeting in December 2017 that it was 17 definitely a difference between Mills High School and 18 Robinson Middle School, and it shouldn't be.</p> <p>19 Q You are talking about their academics?</p> <p>20 A I'm talking about the building, first. 21 Academics, that was my mantra, that we have to do 22 better. Kids can do better, it doesn't matter what 23 color they are. That's what -- we are professionals, 24 we are certified, that's what we do, we help kids. It 25 doesn't matter what color, doesn't matter if they are</p>	<p>1 poor, rich, or whatever.</p> <p>2 Q So, what is this you are referring to in the 3 principals' meeting that you expressed, or concern?</p> <p>4 A In our Complaint, Doctor Warren gave reference 5 to the disparity and to the schools and mentioned what 6 was in the paper about how the funds were spent. And 7 she had us to do an activity about feelings or how we 8 felt. And it just rose -- something rose up in me, 9 and I spoke out against it -- I spoke out against it. 10 I said, "We see what is going on. I have been telling 11 people that it's not fair. You see what's going on as 12 principal. If you allow teachers to teach" -- "to 13 treat kids differently, you are the problem, also." I 14 said that at that meeting December 2017. That's when 15 I -- I felt it before, but that's when I saw change, a 16 difference, and kept saying, "Something is about to 17 happen." Because when you speak out against wrong, 18 it's just natural, nobody is going to be happy about 19 that. It's just normal.</p> <p>20 Q So, when did you speak out, at this principals' 21 meeting?</p> <p>22 A Yes, December 2017.</p> <p>23 Q Okay. And did anybody say anything to you after 24 the meeting?</p> <p>25 A During the meeting, people were crying, and the</p>
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<p>1 principals, I can remember Tracy Allen speaking out.</p> <p>2 Q Tracy Allen?</p> <p>3 A Yes. He said something about -- because he was 4 a coach at Mills, you know, he believed that Mills 5 should have a high school. But he also believed that 6 Sylvan Hills needed an addition, because he was 7 principal over there. But I spoke out against that. 8 Did anybody say anything to me in particular about 9 that, I mean, the devil is smart, so they are not 10 going to say anything. But did they do anything, yes, 11 I noticed it. Yes, I heard people say, yeah, that 12 those black kids, you know, or those kids in those 13 apartments, or those -- "That's why they are not doing 14 anything, that's why we can't get our scores up." And 15 my comment to them was, "What I know, we teach 16 standards and we look at data and we move kids, that's 17 what we do. I hear you, I hear what you are saying, 18 but that's what we do." About those kids, who are 19 those kids. What we do is our job, and that's what we 20 did. And we got pushed back. But it doesn't matter, 21 kids' lives are at stake.</p> <p>22 Q Did anybody ever at Pulaski County School 23 District make racial remarks or disparaging comments 24 to you directly?</p> <p>25 A About when they said, "These kids can't learn,"</p>	<p>1 or, "Those kids." But to me --</p> <p>2 Q No. I'm saying, to you, Ms. Beasley, did they 3 ever say anything racially disparaging or 4 inappropriate to you?</p> <p>5 A They didn't come out and say -- because I have 6 been called the "N" word before. I mean, I'm from 7 south Arkansas.</p> <p>8 Q You are talking about in other contexts?</p> <p>9 A Well, before. So, did they say the "N" word or 10 did they say, "You are black," or, "You can't do it," 11 no, they didn't --</p> <p>12 Q Okay.</p> <p>13 A -- say anything -- say that.</p> <p>14 Q Okay. Well, I just need to know that, because, 15 I mean, this is a race-based lawsuit.</p> <p>16 A Yes.</p> <p>17 Q So, as we sit here, I'm asking if there was 18 anybody at Pulaski County that ever made a racially 19 disparaging comment to you?</p> <p>20 A Not a comment to me. But did they make me feel 21 that way, yes. Because when they were planning -- 22 that's another big component, on DRIVEN. I was 23 isolated from that, from secondary, because I was the 24 only black program administrator on secondary. So, it 25 was me, it was Brandy Beckman and Leta Ray. I wrote</p>

<p style="text-align: center;">Page 57</p> <p>1 an e-mail to Doctor Tackett asking why, if I'm being 2 over science, why wasn't I included in the planning, 3 why did Leta Ray have to tell me about science when 4 she was literacy. I e-mailed Doctor Tackett that. 5 Q When was this? 6 A It might have been January 2018. 7 Q Okay. And did Doctor Tackett respond? 8 A He responded, and he gave me some dates that 9 they were meeting. So, it started out that I went to 10 a couple of meetings, and then later he had a meeting 11 with me, Ms. Townsend, Doctor Pride, and Brandy 12 Beckman was there because she had to tell about -- she 13 had to tell about it, because I didn't know about it, 14 about what they were doing with secondary. Now, I'm a 15 part of the secondary team, part of both teams, K-12. 16 And so, when we asked about DRIVEN, and I can remember 17 me saying, "Well, how is that different from ALE?" 18 So, Doctor Tackett, he got mad and was like, "Well" -- 19 he couldn't answer us, and he kind of got upset. 20 Then, after that, we were saying, "Well, how is that 21 going to help our disparate between black and 22 nonblack?" He couldn't give an answer with that. So, 23 Doctor Pride asked him, "Well, then, why are we here?" 24 And he really got upset and started yelling -- he 25 raised his voice at her. And Ms. Townsend asked,</p>	<p style="text-align: center;">Page 58</p> <p>1 "Well, as a parent, how is it going to help my black 2 son when he needs" -- like that, "he is achieving, he 3 needs help and to be pushed." And he told her, "Well, 4 it may not be for your son. I guess it's not for your 5 son." That was in a DRIVEN meeting. It might have 6 been January, February. 7 Q Is this the only lawsuit you have been a part 8 of? 9 A Yes. 10 Q I think I read, you had filed for bankruptcy -- 11 A Yes. 12 Q -- in 2007? 13 A No. I got released in 2007. It might have been 14 2003, something like that. But we were released in 15 2007. 16 Q Released? 17 A Yeah. 18 Q So, in terms of income, you have listed all of 19 the income that you currently receive? 20 A Yes. 21 Q And your husband is limited to his SSI? 22 A Yes. It's SSA, yeah, to that. 23 Q Have you kept any ongoing notes or diaries 24 regarding this litigation? 25 A No. I mean, we meet with them, we get our</p>
<p style="text-align: center;">Page 59</p> <p>1 complaints or whatever. But just keeping ongoing 2 diaries. I did start when I was told that -- I did 3 record -- or when I say "record", write, and I 4 e-mailed that to Joy about being told that I couldn't 5 work in the district due to a conflict of interest 6 because of the lawsuit. I wrote the days down that 7 they said it. And I e-mailed that to Joy last week. 8 Q Was it a recording? 9 A No. It was -- I took the notes on my phone, on 10 my notes in my phone. 11 Q Okay. 12 A I didn't record anything. I said "record", but 13 writing record. 14 Q So, you did record the meeting with Doctor 15 McNulty? 16 A I didn't record it. 17 Q Well, you know there was a recording? 18 A Yeah. I know it was recorded. I didn't record 19 it. 20 Q But you don't have any other recordings -- 21 A No. 22 Q -- regarding anything in this litigation? 23 A No. 24 Q Ms. Beasley, did you understand everything I 25 asked today?</p>	<p style="text-align: center;">Page 60</p> <p>1 A I did. 2 Q This is your time. Anything that you need to 3 clear up or clarify or add that I didn't talk about or 4 ask you about? 5 A When you asked me about racial things, I was 6 concerned because three white men made the decision to 7 terminate or nonrenew us, and excluded the chief 8 officer who was a black woman, and then the white 9 female did not know about it until -- Ms. Goodwin 10 didn't know about that we got notice until after Paul 11 told her. And Doctor Warren, Paul, her subordinate, 12 told her right before he told us. 13 Q So, the three white men, you are referring to 14 Paul Brewer? 15 A Paul Brewer, Doctor Tackett, and Will Reid. And 16 in that hearing on that Saturday, Paul Brewer was 17 like, "Well, I'm not the only one. Y'all are blaming 18 me, but I asked Doctor Tackett and Will, and they 19 suggested their names, they gave me their names." 20 Q It was the entire -- it was all the program 21 administrators; correct? 22 A It was all of them. But out of the three, one 23 of them was rehired -- out of five of us, the white 24 female was rehired, and the other female had a job, 25 and she told me Doctor Tackett helped her get that job</p>

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1 at Benton. I heard -- she was talking to Ms. Darlene
 2 Serfaty and she said, "Yes, Doctor Tackett gave us a
 3 good recommendation." And it kind of startled me,
 4 because before then he wasn't returning our phone
 5 calls or coming to the office right before he left.
 6 So, I just thought that was interesting.

7 Q Okay. I don't know if that's true or not. But
 8 my question would be, is that a problem for him to
 9 give her a reference?

10 A Well, it's a problem if we -- no, not to give a
 11 reference.

12 Q Okay.

13 A But it's a problem that you are communicating,
 14 and when I'm calling you for something that has to do
 15 with work and you don't call us back or you are asking
 16 us to meet you at another school to get my evaluation,
 17 and not coming to work, to our central location. So,
 18 you talk to people when you want to, is my thinking.
 19 That's a problem.

20 Q And you heard that from Ms. Beckman?

21 A Yes.

22 Q You overheard her telling somebody that --

23 A Yes.

24 Q Doctor Tackett had given her a
 25 recommendation?

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1 A Yes. And I came over and said, "Oh, really,"
 2 you know. I interjected myself.
 3 Q Anything else to add, Ms. Beasley?
 4 A No. I'm done.

5 MR. KEEPS: Thank you, ma'am. Thank you
 6 for your time.

7 (WHEREUPON, at 11:28 a.m., the taking of
 8 the above-entitled deposition was concluded.)

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1 Exhibit One.

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ERRATA
 PAGE\LINE SAYS: SHOULD SAY:

Page 65

SIGNATURE

I, Jennifer Beasley, do hereby certify that I have read the foregoing pages, and the same is a true and correct transcription of the proceedings that occurred, except for the corrections (if any) that appear on the Errata Sheet.

Jennifer Beasley

STATE OF ARKANSAS)

) ss.:

COUNTY OF _____)

WITNESS MY HAND AND SEAL, this _____

day of _____, 2019.

NOTARY PUBLIC

MY COMMISSION EXPIRES:

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with the action, and have no interest in the outcome or results of this litigation.

WHEREFORE, I have subscribed my signature and affixed my notarial seal as such notary public at the City of Little Rock, County of Pulaski, State of Arkansas, this the 10th day of June, 2019.

DEBBYE L. PETRE, CCR
NOTARY PUBLIC IN AND FOR
PULASKI COUNTY, ARKANSAS

My Commission Expires:

August 4, 2020.

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CERTIFICATE

STATE OF ARKANSAS)

) ss.:

COUNTY OF PULASKI)

I, DEBBYE L. PETRE, Certified Court Reporter and notary public in and for the County of Pulaski, State of Arkansas, duly commissioned and acting, do hereby certify that the witness herein was by me first duly sworn to testify the whole truth and nothing but the truth prior to taking down in Stenotype the questions, answers, and proceedings during said deposition, and from such recordation was thereafter reduced to print by means of computer-assisted transcription, and the same fully, truly, and correctly reflects the proceedings had.

I FURTHER CERTIFY that the above deposition was given by the witness and taken at the times and in the place hereinabove set forth.

I FURTHER CERTIFY that I am not attorney or counsel of any of the parties, nor am I relative or employee of any attorney or counsel or party connected

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